

The Honorable Brian D. Lynch
Hearing date: February 26, 2014
Hearing time: 9:00 a.m.
Response date: February 19, 2014
Chapter 7
Location: Tacoma

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re:

JASON and JILL SUESS,

Debtors.

No. 12-41679

MOTION FOR SALE OF PROPERTY
FREE AND CLEAR OF LIENS

COMES NOW the Trustee, Kathryn A. Ellis, and moves the Court for an order permitting sale of the real property located at 10 Bristol Rd, White Salmon, WA, free and clear of all liens, for the sum of \$241,000.00 to Preston and Allison Clinton, or to the individual(s) making the highest and best offer to the estate at or before the hearing on this Motion.

The Trustee seeks authority to pay the first position Deed of Trust of Wells Fargo Bank NA in the amount of approximately \$202,505.00, all costs of closing, including real estate commissions, excise taxes and other closing costs, with a net carveout to the estate in the amount of \$9,395. At least one half of such amount will be distributed to unsecured creditors. The Trustee also seeks authority to pay the second position Deed of Trust of JPMorgan Chase Bank NA in the amount of \$5,000.00 in full satisfaction of its lien against this property.

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MOTION FOR SALE OF PROPERTY FREE AND CLEAR OF LIENS - 1

KATHRYN A. ELLIS, ESQ.
600 Stewart St
Suite 1300
Seattle, WA 98101
(206) 682-5002

1 Said sale to Preston and Allison Clinton will be free and clear of all liens and interests,
2 said liens and interests to attach to the proceeds of the sale as though those proceeds were the
3 property with the exception of the carveout to the estate. Notwithstanding the foregoing, the
4 Trustee requests the authority to pay the above named secured creditor in the amount stated.
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6 DATED this 29th day of January, 2014.

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8 /s/ Kathryn A. Ellis
Kathryn A. Ellis, Trustee

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